STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION
AND PUBLIC FACILITIES

STATEWIDE DESIGN & ENGINEERING SERVICES DIVISION
BRIDGE SECTION

TONY KNOWLES, GOVERNOR

3132 CHANNEL DRIVE
JUNEAU, ALASKA 99801-7898

PHONE: (907) 465-2975
TEXT:(907) 465-3652
FAX: (907) 465-6947

U.S. Department of Transportation
Documents Management Facility, Room PL-401
400 Seventh Street, SW
Washington, D.C. 20590

The Alaska Department of Transportation and Public Facilities' comments on the Advance Notice of Proposed Rulemaking (FHWA Docket No. FHWA-2001-8954) for the National Bridge Inspection Standards are listed below:

Application of Standards:

- FHWA should consider revising the definition of a bridge to include bridge type structures that are less than 20 feet in length. Ensuring structural adequacy and identifying functional obsolescence of bridge type structures less than 20 feet in length is important for the safety of the traveling public.

  The current definition for culvert type structures is adequate.

  Decreasing the defined length of a bridge will increase the number of structures that will require inspection. The potential impact on HBRRP funds is not known.

Inspection Procedures:

- Factors such as environment (benign v. corrosive), foundation type, and condition should be considered when determining underwater inspection frequency. Some bridges do not require a five-year cycle and others may require more frequent inspections. No significant adverse impact from modifying the required underwater inspection frequency is anticipated.
- Technical advisory T5140.23 needs to be updated if it is to be included in regulation. However, guidance by definition is not regulation and should not be codified as such. Technical advisories and publications such as HEC-18 are sufficient.

Frequency of Inspections:

- Many bridges in Alaska are located in remote locations on closed road systems with low ADT's. In some instances the bridges may only be open 6-8 months of the year and the only vehicular traffic are 4-wheeled all terrain vehicles and snow machines.

  Because of the low ADT we feel it may not be necessary to inspect some of these structures on a two-year frequency. The majority of these bridges do not meet the current criteria to be considered for inspection intervals greater than 2 years.

We suggest that revising the current criteria to allow more bridges to qualify for an increased inspection interval is appropriate. A four-year maximum interval for routine inspections is reasonable

Qualification of Personnel:

- We agree that the Professional Engineer qualification should be limited to registered civil or structural engineers.
- We do not feel it necessary to have qualified professional engineers perform underwater inspections as long as a qualified engineer is in visual and audible communication with the diver and is directing the inspection.

Inspection Report:

- We agree with only allowing the inspector who was out in the field to change the inspection report. There would be minimal impact from this requirement.

Inventory:

- We recommend that the Recording and Coding Guide be published in English units and that NBI data submittals in English units be allowed.

If there are any questions, please contact Drew Sielbach at (907) 465-6942.